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Attorneys for Plaintiff  
VERIGY US, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;  
WESLEY MAYDER, an individual; SILICON  
TEST SYSTEMS, INC., a California Corporation;  
and SILICON TEST SOLUTIONS, LLC, a  
California Limited Liability Corporation,  
inclusive,

Defendants.

Case No. C07 04330 RMW (HRL)

**[PROPOSED] ORDER GRANTING  
PROTECTIVE ORDER RELIEVING  
VERIGY OF DUTY TO RESPOND  
FURTHER TO DEFENDANTS' SECOND  
AMENDED NOTICE OF RULE 30(b)(6)  
DEPOSITION**

Date: September 30, 2008  
Time: 10:00 am  
Ct. rm.: 2, 5th Floor  
Judge: Hon. Howard R. Lloyd

Complaint Filed: August 22, 2007  
Trial Date: None Set

AND RELATED CROSS-ACTIONS

1 This matter having come before the Court on the Motion of plaintiff Verigy US, Inc. for a  
2 protective order relieving it of the duty to further respond to Defendants' Second Amended Notice  
3 of Rule 30(b)(6) Deposition of Verigy US, Inc., and the Court having reviewed the motion and the  
4 respective briefs, and heard the arguments of respective counsel, and good cause appearing,  
5 accordingly,

6 **IT IS HEREBY ORDERED THAT:**

- 7 (a) Verigy's Motion for a Protective Order is GRANTED with respect to  
8 Defendants' Second Amended Notice of Rule 30(b)(6) Deposition of  
9 Verigy US, Inc. (Second Amended Depo Notice);
- 10 (b) Verigy need not respond to such discovery, and in particular, Topic Nos.  
11 14, 19-20, 34 and 36 of the Second Amended Depo Notice, except insofar  
12 as it has otherwise agreed to do so and also subject to any objections by  
13 Verigy served on Defendants prior to the deposition dates (August 26, 27,  
14 28 and 29, 2008);
- 15 (c) Verigy is relieved from providing any further or additional testimony  
16 pursuant to Federal of Rule of Civil Procedure 30(b)(6); and
- 17 (d) Verigy is and shall not be prejudiced at trial by its agreement to produce  
18 corporate designee witness on certain specified topics to the extent the  
19 production of such witness was subject to the aforementioned objections.

20 **IT IS SO ORDERED.**

21  
22 Dated: \_\_\_\_\_

23 \_\_\_\_\_  
24 Hon. Howard R. Lloyd  
25 UNITED STATES MAGISTRATE JUDGE  
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